

TO: ATSDR. DIV. HEALTH ASSESSMENT; PROGRAM EVALUATION, R & I E-56
1600 CLIFTON RD, N.E., ATLANTA, GA. 30333 FAX- 404-639 0653

MAR. 6, 1999 1 OF 12

CRITIQUE OF ATSDR PUBLIC HEALTH ASSESSMENT FOR THE NORTHPORT AREA JAN 22, 1999.

FROM: (b) (6) BOX (b) NORTHPORT, WA. 99157 (b) (6) IMPACTED RESIDENT
OF THE COLUMBIA RIVER VALLEY WITH STANDING.

SUMMARY:

THE ATSDR HEALTH ASSESSMENT OF NORTHPORT IS ONLY AS GOOD AS THE POLLUTION DATA USED TO FORM ITS CONCLUSIONS. MY COMMENTS WILL DEAL LARGELY WITH THE VALIDITY OF THIS DATA. I WILL POINT OUT INSTANCES OF 'ERROR'; MALPOSITIONING OF, AND IMPROPER AIR MONITORING; IMPROPER SOIL STUDY; LACK OF DIOXIN TESTING; LACK OF CORE SAMPLING; AND RELATED INSTANCES SHOWING CONCEALMENT OF DATA AND VIOLATION OF FOIA REQUESTS. TAKEN INDIVIDUALLY THESE ACTS DO NOT SEEM SIGNIFICANT, BUT WHEN TOTALED THEY SHOW A TREND AND DESIGN TO PROTECT CORPORATE AND GOVERNMENT INTERESTS OVER THE HEALTH AND PROPERTY INTERESTS OF THE CITIZENS OF THE COLUMBIA RIVER VALLEY.

OUR MAJOR HEALTH PROBLEM IS LOCATED NOT IN THE TOWN OF NORTHPORT, BUT IN A SMALL AREA IN THE COLUMBIA RIVER VALLEY A FEW MILES NORTH OF NORTHPORT. THIS AREA OF CONCERN CORRESPONDS TO THE HEAVY FUME FALLOUT AREA OF ZONE I AS DELINEATED IN THE TRAIL SMELTER CASE STUDY. TO INCLUDE OUR CONCENTRATED IBD RATE INTO A COUNTY, A ZIP CODE, OR EVEN THE TOWN OF NORTHPORT DILUTES THE SEVERITY OF OUR PROBLEM.

BY LARGE THE WA DOE & DOH HAVE TRIED TO AVOID TESTING IN THIS HEAVY FALLOUT AREA OF THE COLUMBIA RV. VY. DOE IN PARTICULAR BY INVALIDATING OUR HIGHEST POLLUTION READINGS, WORTHEN PH II; BY ALTERING DATA & MONITOR PLACEMENT, ARNOLD PH I; AND BY FAILING TO ACTIVATE THE BENNETT PH IV MONITOR UNTIL AFTER THE OLD TRAIL SMELTER WENT OUT OF OPERATION CONTRARY TO PH IV MONITORING PLAN.

THE 1928/41 TRAIL SMELTER CASE AIR STUDY OF THE COLUMBIA RV. VY. WAS VERY THOROUGH & COMPETENT. WA-DOE, DOH, & NOW ATSDR BY LARGE HAVE NEGLECTED THIS PRECEDENT SETTING STUDY.

SINCE OUR CITIZEN HEALTH SURVEY OUR NEIGHBORHOOD HAS HAD TWO MORE BRAIN ANEURYSMS, ONE MORE CANCER, & ONE MORE LEUKEMIA THAT I AM AWARE OF WITHOUT A SURVEY. THERE ARE PROBABLY MORE.

SOME OF THE SHORTCOMINGS OF THIS ATSDR NORTHPORT HEALTH ASSESSMENT ARE:



1. DOH SOIL STUDY

- a. INVALID BECAUSE NOT ENOUGH SITES SAMPLED. NORTHPORT 3, ASARCO-TACOMA 70, & CITY OF TRAIL 31. COLUMBIA RV VY POLLUTION NO. OF NORTHPORT HIGHER THAN TRAIL (TALL SMOKESTACKS).
- b. ATSDR DID NOT INCORPORATE ASARCO OR TRAIL SOIL STUDIES INTO STUDY. NOT IN BODY OF REPORT OR REFERENCES.
- c. ATSDR'S USING MORRISY SOIL TEST RESULTS AS A VALID BACKGROUND COMPARISON.
- d. DR. JOEL HIRSCHHORN PHD (b) (6) WHEATON MARYLAND 20902, STATES SOIL SAMPLES SHOULD BE TAKEN ONLY FROM THE SURFACE OF UNDISTURBED NATURAL SOILS.
- e. THE EBERLY ORGANIC GARDEN HAD THE HIGHEST READINGS, NEARBY ARNOLD AIR READINGS THE LOWEST

2. HOW CAN THE NORTHPORT HEALTH ASSESSMENT BE ATSDR'S "BEST EFFORT"? (NOTE OF EXPLANATION PAGE FIRST PARA). ATSDR MEDICAL PERSONNEL FAILED TO COME TO NORTHPORT FOR ON SCENE FOLLOWUP AS STATED BY ATSDR'S RICH ROBINSON.

3. ATSDR REPT. PG 39 LISTS PREPARERS OF REPT AS LANGMANN, PATTERSON, SCHNELL, & ROBINSON. OUR INFORMATION HAS IT THAT MEG WILCOX PREPARED OR ASSISTED IN PREPARING THIS REPT. WHY WAS HER NAME WITHHELD? WHO IS SHE? WHAT ARE HER CREDENTIALS? WHO IS EASTERN RESEARCH? DO THEY DO CONTRACT WORK FOR THE MINING & SMELTING INDUSTRY? FOR THE PULP INDUSTRY OR OTHER POLLUTERS?

4. 'REFERENCES' PG 40.

- a. WHY DID YOU NOT USE OR WHY DID DOE NOT PROVIDE YOU WITH THEIR 1983/85 NORTHPORT AIR MONITORING STUDY OR DATA? WHAT IS DOE HIDING?
- b. WHY DID YOU NOT USE OR WHY DID DOE NOT PROVIDE YOU WITH THEIR 1983 MARBLE FLATS (7 MIS. SO OF NORTHPORT) AIR MONITORING STUDY OR DATA? WHAT IS DOE HIDING?
- c. WHY DID YOU NOT USE THE DEAN & SWAIN COLUMBIA RV VY MET. STUDY AS A REFERENCE, U.S. DEPT OF INERIOR BULLETIN #453, 1944. IT IS VERY IMPORTANT & 'CURRENTLY AVAILABLE' (ADDEN# 4)

(b) (6)

'REFERENCES' PG 40 CONT'D

d. WHY DID YOU NOT USE THE 1990 LAKE ROOSEVELT FISH/HEALTH STUDY. SUBMITTED AT THE 1991 ANNUAL SYMPOSIUM ON DIOXINS BY DOH & SUBSEQUENTLY WITHDRAWN UNDER QUESTIONABLE CIRCUMSTANCES? NATIONAL DIOXIN EXPERTS SAID STUDY WAS FAULTY (ADDEN.#3).

5. WA DOE ATTEMPTED TO LIMIT PARTICIPATION OF ELECTED CITIZENS IN THE LAKE ROOSEVELT WATER QUALITY COUNCIL & TO PREVENT HUMAN HEALTH FROM BEING A LRWC ISSUE. A SUBSEQUENT PUBLIC ELECTION MANDATED HUMAN HEALTH AS THE NUMBER ONE CONCERN. ONLY BY CITIZEN PETITION TO OUR LEGISLATORS DID WE GET AIR MONITORING FOR THE COLUMBIA RV VY.

6. DOE AIR MONITORING STUDY

a. ACCORDING TO THE TRAIL SMELTER CASE (TSC) THE SO₂ LEVEL AT THE CANADIAN BORDER WAS TWICE AS HIGH AS AT NORTHPORT. A CONCLUSION CAN BE DRAWN THAT THE NORTHPORT HIGH SO₂ MONITOR IS REPORTING ONLY $\frac{1}{2}$ THE SO₂ POLLUTION SUFFERED BY THE RESIDENTS OF THE COLUMBIA RV VY NEAR THE CANADIAN BORDER (SEE ADDEN# 4). A SIMILAR PATTERN OF AIR POLLUTION FALLOFF WAS ESTABLISHED BY THE DOE PH II MONITORING. EXCEPT FOR CU & MG THE PAPERION MONITOR READINGS FOR HEAVY METALS WAS APPROX. $\frac{1}{2}$ THAT OF THE READING RECORDED AT THE WANETA MONITOR AT THE BORDER (ADDEN# 10). THE T.S.C. DETERMINED THAT THE HEAVY FALLOUT AREA ENDED APPROX. 6 MI. SO. OF THE CANADIAN BORDER AS THE RIVER RUNS. WITH FEW EXCEPTION THE MONITORING OF THE PRESENT STUDY WAS DONE SO. OUTSIDE THE HEAVY FALLOUT AREA. THE TWO DOE MONITORS CLOSE TO THE CANADIAN BORDER SUSTAINED IRREGULARITIES.

b. THE HIGHEST READING PH II MONITOR IN THE U.S. WAS AT THE WORTHEN SITE WELL IN THE HEAVY FALL OUT AREA. DOE INSTALLED THIS MONITOR ON & UNDER A TREE, THEN THREW THE RESULTS OUT BECAUSE THEY WERE OBTAINED FROM UNDER A TREE.

c. THE ARNOLD PH I MONITOR ADJACENT TO THE BORDER BUT OUTSIDE THE COLUMBIA RV VY & ITS HEAVY FUMIGATION PATHWAY, IS THE SUBJECT OF ERRORS, ALTERATIONS, & CONTRADICTION. 'ERRORS' IN THE 1994 DOH AIR MONITORING & HEALTH STUDY, ALTERATIONS IN THIS STUDY & IN THE COMPILED DATA, CONTRADICTION IN THE FILTERS, & THE COMPARATIVE HIGH SOIL RESULTS WITH THE ADJOINING EBERLY ORGANIC GARDEN VS. THE LOW ARNOLD AIR RESULTS, AND A ORIMINAL FRAUD INVESTIGATION OF QUESTIONABLE QUALITY BY THE EPA-10 INSPECTOR GENERALS OFFICE.

d. THE COMINCO OWNED PH IV BENNETCH AIR MONITOR OPERATED BY COMINCO IN COOPERATION WITH DOE WAS SCHEDULED TO MONITOR THE OLD SMELTER BEFORE IT WENT OUT OF PRODUCTION. HOWEVER THE STARTUP OF THIS MONITOR WAS DELAYED UNDER QUESTIONABLE CIRCUMSTANCES UNTIL AFTER IT WENT OUT OF PRODUCTION, NEGATING FOREVER THIS OPPORTUNITY TO MONITOR.

7. ATSDR NEGLECTED THE POLLUTION, PAST & PRESENT, FROM THE CELGAR PULP MILL IN CASTLEGAR B.C. AT ONE TIME IT WAS RATED ONE OF THE 'DIRTIEST' PULP MILLS IN B.C., IT WAS MODERNIZED & 'CLEANED UP' IN THE PAST DECADE. THIS BEING THE CASE IT IS HARD TO BELIEVE THAT STUDIES ON IT WERE NOT DONE BY B.C. ENVIRONMENT & OR ENVIRONMENT CANADA, & BE 'CURRENTLY AVAILABLE'. CELGAR DISCHARGED EFFLUENTS INTO THE COLUMBIA RV & EMITTED FUMES DETECTABLE IN THE U.S. COLUMBIA RV VY.

8. UPSTREAM CANADIAN MUNICIPAL SEWERAGE DISCHARGES INTO THE COLUMBIA RIVER. AGAIN NO APPARENT STUDY BY ATSDR. STUDY REPORTS SURELY 'CURRENTLY AVAILBLE' FROM BC ENVI. & OR ENVI CANADA.

WE HAVE NEVER MAINTAINED THAT COMINCO IS THE SOLE CAUSE OF OUR POLLUTION & HEALTH PROBLEMS. WE ARE NOT QUALIFIED TO DO SO. WHAT WE DO EXPECT IS AN HONEST & BROAD SPECTRUM STUDY BY OUR ENVIRONMENTAL & HEALTH AGENCIES, & A THOROUGH HEALTH STUDY BY ATSDR TO FIND THE CAUSES OF OUR ILLNESSES SO THEY CAN BE PREVENTED.

9. LIMITED SPECTRUM OF METALS & NO DIOXIN STUDIED BY DOE & DOH IN AIR & SOILS. SINCE THE CAUSE OF COLITIS IS UNKNOWN A BROAD SPECTRUM SHOULD HAVE BEEN STUDIED. THE TRAIL SOIL STUDY ANALYZED 29 METALS, THEY ARE PROBABLY IN A BETTER POSITION THAN ANYONE TO KNOW WHAT IS BEING EMITTED FROM THE SMELTER.

THE ASARCO STUDY TESTED FOR 19 METALS. (ADDEN.# 5, 6, & 7)

DOE ANALYZED 7 METALS IN THEIR AIR MONITOR STUDIES.

DOH ANALYZED 4 METALS IN THEIR SOIL STUDY. (ADDEN# 10 & 13)

10. A STATISTICAL CONCLUSION CAN BE DRAWN FROM ALL OF THESE REPEATED INCIDENTS WHICH REDUCED POLLUTION MEASURED. THE STUDIES WERE DESIGNED TO UNDER MEASURE POLLUTION.

"A NOTE OF EXPLANATION" (THE SECOND INTRODUCTORY PAGE OF THE ATSDR HEALTH ASSESSMENT FIRST PARA)- "THIS DOCUMENT REPRESENTS THE AGENCIES BEST EFFORTS, BASED ON CURRENTLY AVAILABLE INFORMATION". I QUESTION THE VALIDITY:

1. THAT THIS IS THE "BEST EFFORT" THAT ATSDR CAN DO:

a. ATSDR'S REGION 10 REPRESENTATIVE, RICH ROBINSON, AT TIME OF INTERVIEWING IMPACTED COLUMBIA RV VY RESIDENTS TOLD US ATSDR MEDICAL PERSONEL WOULD COME HERE & CONDUCT FOLLOWUP INVESTIGATIONS. TO DATE THIS HAS NOT HAPPENED. THEREFORE ATSDR'S ASSESSMENT IS NOT THEIR "BEST EFFORT".

FOR INSTANCE WE HAVE A HIGH INCIDENCE OF INFLAMMATORY BOWL DISEASE (ADEN# 8). ALTHOUGH WE CITIZENS FOR A CLEAN COLUMBIA WERE ABLE TO GET RESPONSES FROM MANY OF THE COLUMBIA RV VY IMPACTED RESIDENTS WE FEEL THE RESPONSES WERE LIMITED PARTLY BECAUSE OF THE FECULANT NATURE OF IBD, IT IS SOMETHING ONE TENDS TO CONCEAL, NOT TELL YOUR NEIGHBORS ABOUT. WHEREAS THEY WOULD CONFIDE TO MEDICAL PERSONNEL. ALSO INTROVERTED PEOPLE ARE UNLIKELY TO ATTEND PUBLIC MEETINGS & IF SO WILL NOT SPEAK OUT IN FRONT OF PEOPLE.

THEREFORE WE FEEL IT NECESSARY THAT DOOR TO DOOR INTERVIEWS BE CONDUCTED IN THE IMPACTED AREA UNDER A DOCTOR-PATIENT TYPE CONFIDENTIALITY.

2. BASED ON "CURRENTLY AVAILABLE INFORMATION"

a. NO APPARENT EFFORT WAS USED BY ATSDR TO QUESTION THE VALIDITY & RELEVANCY OF THE STUDIES AND DATA SUBMITTED BY INVOLVED COUNTY, STATE, & FEDERAL AGENCIES. THIS IS PERTANENT BECAUSE TIME AFTER TIME THE ATSDR REPORT STATES THAT THE TOXIC LEVELS SUBMITTED BY THE ABOVE AGENCIES DOES NOT REACH THE CRITERIA OF A HEALTH CONCERN.

b. OUR POSITION IS THAT MANY OF THEIR STUDIES ARE SLANTED TO UNDER REPORT TOXICITY LEVELS. THE REPETATIVE NATURE OF THIS UNDER REPORTING DEMONSTRATES INTENT BY TREND & DESIGN THE VALIDITY OF OUR CONCLUSION. SPECIFIC INCIDENTS WILL FOLLOW IN THIS CRITIQUE. AT ONE POINT THEIR ACTIONS REACHED THE LEVEL OF A CRIMINAL FRAUD INVESTIGATION BY THE EPA-10 INSPECTOR GENERALS OFFICE (ADEN# 9 pgs 37,38, & 39).

3. 'REFERENCES' PG 40.

ALTHOUGH THE 1941 TRAIL SMELTER ARBITRAL TRIBUNAL DECISION IS USED AS A REFERENCE IT DOES NOT APPEAR THAT THE ATSDR REPORT GAVE IT THE WEIGHT THAT IT DESERVES. THE TRAIL SMELTER CASE WAS THE MOST THOROUGH AIR POLLUTIN STUDIES OF ITS DAY EXCEEDING THE ACCURACY & THOROUGHNESS OF THE PRESENT WA DOE STUDY.

a. THE TSC DETERMINED THAT THE SO2 HEAVY FALLOUT AREA OF THE COLUMBIA RV VY WAS FROM THE COLUMBIA GARDENS SO. ALONG THE RIVER TO 6 MIS SO. OF THE CANADIAN BORDER. PG 286 DEAN & SWAIN STUDY "CURRENTLY AVAILABLE" TO PRIVATE CITIZENS (ADEN# 4).

b. IN 1925 THE TRAIL SMELTER CONSTRUCTED 400' TALL SMOKE STACKS TO MOVE THE FUMES AWAY FROM THE TRAIL AREA, BECAUSE LOCAL CANADIAN FARMERS COMPLAINED CROP DAMAGE (ADEN# 16). THIS IS WHY THE NO. PORTION OF THE U.S. COLUMBIA RV VY IS MORE POLLUTED THAN TRAIL AS CORROBERATED BY FH II DOE STUDY TABLE 8 PG 31 (ADEN# 10). .57% OF THE RESULTS FROM THE AIR MONITORS IN FH II NO. OF NORTHPORT WERE HIGHER THAN TRAIL.

ALTHOUGH ATSDR'S ASSESSMENT INDICATES THAT THE DOH SOIL STUDY WAS INADEQUATE, IT UNDER PLAYS ITS INADEQUACY BY FAILING TO LIST VERY RELEVANT LOCAL SMELTER/GARDEN SOIL STUDIES THAT WOULD HAVE GRAPHICALLY ILLUSTRATED THE SCOPE OF WHAT THE DOH STUDY SHOULD HAVE BEEN.

a. THE TRAIL, B.C. SOIL STUDIES, 435 SAMPLES FROM 31 GARDENS, TESTED FOR 29 METALS, AS. AVG LEVEL- TRAIL 42.6, NORTHPORT 82.1 (ADEN# 5).

b. ASARCO SOIL STUDIES 70 GARDENS TESTED PLUS GREENHOUSE STUDIES, TESTED FOR 19 METALS. AFTER 20 YRS STUDY NO DISCERNABLE HEALTH PROBLEMS FOUND. (ADEN# 6 & 7)

c. ATSDR FAILED TO LIST WASH. ST. AVERAGE BACKGROUND LEVELS IN THEIR REFERENCES SECTION OR NOTE IN BODY OF REPORT. THIS IS RELEVANT WHEN THE TOXIC LEVELS OF SOILS ARE COMPARED BETWEEN NORTHPORT & CONTROL MORRISSEY; BETWEEN MORRISSEY & WA. ST. AVG BACKGROUND LEVELS; & BETWEEN NORTHPORT & WA. ST. AVG. BACKGROUND LEVELS. THESE OMISSIONS QUESTION THE OBJECTIVITY OF THE ATSDR ASSESSMENT.

4. PROBLEMS WITH TESTING.

a. WA. DOE MALPOSITIONED THE PH II WORTHEN AIR MONITOR ATTACHING TO & UNDER THE CANOPY OF A TREE. THEN LATER THREW THE RESULTS OUT BECAUSE THE MONITOR WAS UNDER A TREE. WHY DID DOE ATTACH THE MONITOR UNDER A TREE WHEN THERE WAS A CLEAR AREA IN A ADJACENT GARDEN & WORTHEN WAS WILLING TO HAVE IT THERE (SEE MAP, DIAGRAM, & PHOTOS ADEN# 2).

THE POLLUTION RECORDINGS FROM THIS MONITOR WERE THE HIGHEST OF ALL U.S. PH II RECORDINGS & HIGHER THAN TRAIL. THE PROBABILITY IS THAT THE WORTHEN MONITOR BEING UNDER A TREE CANOPY LOWERED ITS READINGS DUE TO IMPEDENCE OF AIR FLOW TO MONITOR.

THE ELIMINATION OF THE WORTHEN READINGS LOWERED THE AVERAGE OF ALL THE U.S. PH II READINGS, & IT ELIMINATED THE ONLY RECORDING OF AIR POLLUTION IN THE HEAVY FUME PATHWAY OF THE HEAVY FALLOUT AREA FROM THE OLD SMELTER.

b. MORASKI FLATS. THE HIGHEST SO₂ READING, 1.6 PPM. WAS OBTAINED HERE DURING THE IJC PHASE OF THE TRAIL SMELTER CASE BY DR GRIFFIN USDA (SEE MAP ADEN# 2 & BRIEF ADEN# 14). WE CITIZENS REQUESTED THAT THIS BE THE LOCATION FOR THE PERMANENT PH IV AIR MONITOR. THE PRESENT OWNER OF THE MORASKI FARM, (b) (6), WAS AGREEABLE TO PLACEMENT ON HIS PROPERTY & AGREED TO HELP WITH OPERATION. DOE & COMINCO REFUSED THIS LOCATION DUE TO COST & DIFFICULTY OF ELECTRIFICATION. THIS WAS ON MAY 29, 1996, WHEREUPON DOE SELECTED THE BENNETCH SITE.

THE STATED PURPOSE OF PH IV WAS TO RECORD THE AIR POLLUTIN FROM THE OLD SMELTER, THEN RECORD THE NEW KIVCET SMELTER WHEN IT WENT ON LINE. (b) (6) OFFERED TO RUN THE ELECTRICITY FROM THEIR HOUSE. THIS SITE IS ADJACENT TO THE ROAD WHERE THE POWER LINE IS. COMINCO UNDER DOE'S OVERSIGHT THEN SKEWED THE PH IV MONITORING PLAN BY DELAYING THE STARTUP OF MONITORS UNTIL THE SUMMER OF 1997 AFTER THE OLD SMELTER WENT OUT OF PRODUCTION, CLAIMING THEY COULD NOT GET THE POWER TURNED ON IN TIME. THUS LOSING FOREVER AN ACCURATE MEASUREMENT IN THE HEAVY FALLOUT ZONE IN THE COLUMBIA RV VY HEAVY FUME PATHWAY OF THE HEAVY METAL FUMIGATION FROM THE OLD SMELTER. IT TAKES OVER A YEAR TO TURN THE POWER ON WHEN THE SITE IS ADJACENT TO THE POWER LINE?

THE BENNETCH MONITOR IS SITED CLEAR OF PHYSICAL OBSTRUCTIONS IN A FIELD, THE MONITOR PLACEMENT ON THE PLATFORM IS BAD AS THEY ARE WITHIN 10 TO 12 INCHES OF EACH OTHER. THEY ARE USING THE OLD STYLE LOW EFFICIENCY TSP MONITORS WHICH ARE OF QUESTIONABLE VALUE IN MEASURING VERY SMALL PARTICULATE SIZE (SEE MAP, DIAGRAM, & PHOTOS ADEN# 2). COMINCO REFUSES TO SUPPLY DATA OF PARTICULATE SIZE FROM NEW KIVCET SMELTER. IF SMALLER THEY COULD BE MORE HARMFUL TO HUMAN HEALTH.

THE BENNETCH MONITOR IS POSITIONED FOR THE FALLOUT PATTERN FROM THE OLD SMELTER WITH ITS TALL SMOKESTACKS & HEAVIER PARTICULATES. THE NEW KIVCET IS NOT SUPPOSED TO USE THE TALL STACKS, & THE PARTICULATE SIZE IS RUMORED TO BE SMALLER. THIS COULD ALTER THE FALLOUT PATTERN.

c. SO₂ FALLOFF RATIOS. THE FALLOFF RATIOS WERE ESTABLISHED IN THE TRAIL SMELTER CASE AS FOLLOWS:

THE COMINCO COLUMBIA GARDENS SO₂ RECORDER WAS ESTABLISHED BY THE DECISION OF THE ARBITRAL TRIBUNAL IN THE TRAIL SMELTER CASE TO OPERATE IN PERPETUITY. IT IS ON THE EAST SIDE OF THE COLUMBIA RIVER 6 MI. SO. OF THE SMELTER & 4 MI. NO. OF THE BORDER, & IS ABOVE THE KNEE OF THE ATTENUATION CURVE.

THE WANETA RECORDER WAS 10 MI. BELOW THE SMELTER JUST ABOVE THE CANADIAN BORDER & IS IN THE REGION OF VERY RAPID FALLOFF. THIS WAS A TEMPORARY RECORDER FOR THE TRAIL SMELTER CASE. THE RAPID FALLOFF CONTINUES TO A POINT 16 MIS BELOW THE SMELTER (6 MIS BELOW THE BORDER)

THE COMINCO NORTHPORT SO₂ RECORDER IS 19 MIS BELOW THE SMELTER AS MEASURED BY THE COURSE OF THE RIVER & ALSO ESTABLISHED BY COURT. IT IS SEVERAL MIS. BELOW THE POINT OF RAPID FALLOFF. (SEE MAP ADEN# 2).

THE NORTHPORT RECORDER IS WELL BELOW THE KNEE OF THE CURVE & OUTSIDE THE HEAVY FALLOFF AREA. IN THE YEARS 1932 TO 1935 THE AVERAGE RATIO BETWEEN COLUMBIA GARDENS & NORTHPORT WAS 1:TO .31. IN THE SAME YEARS THE AVERAGE RATIO BETWEEN COLUMBIA GARDENS & WANETA WAS 1 TO .6 (ADEN# 4 PG 286, ADEN# 11 PG 31).

d. HEAVY METAL FALLOFF. A SIMILAR FALLOFF PATTERN WAS INDICATED FOR HEAVY METALS IN THE PH II DOE AIR MONITORING. (ADEN# 10 PG 31)

THE WANETA FUMIGATIONS WERE APPROXIMATELY TWICE AS HEAVY AS THE PAPAICH FUMIGATIONS. A SIMILAR FALLOFF PATTERN WAS SHOWN AT THE ASAROO SMELTER (ADEN# 6).

e. THE NORTHPORT HI MONITOR IS CORRECTLY POSITIONED TO PROTECT THE STUDENTS & THE RESIDENTS OF NORTHPORT, BUT IT DOES NOT PROTECT THE RESIDENTS IN THE HEAVY FALLOFF AREA, WHICH IS ROUGHLY TWICE THAT OF THE AREA TO THE SO. SINCE THE HIGH WORTHEN RESULTS WERE THROWN OUT UNDER QUESTIONABLE CIRCUMSTANCES A PATTERN OF MALPOSITIONING FOR LOW READINGS EMERGES.

f. THE ARNOLD SITE 1993 PH I AIR MONITORING RAISES MORE QUESTIONS.

APPROX. 2 WEEKS PRIOR TO THE END OF PH I MONITORING A TSP MONITOR WAS BROUGHT TO THE ARNOLD SITE TO CORROBORATE THE SEQUENTIAL MONITOR THAT HAD BEEN MONITORING THERE FOR ALL OF PH I.

THE FIRST 'ERROR' IS THAT TABLE 5 PG 24 1994 DOH AIR & HEALTH REPORT, IT SHOWS THAT THE ABOVE SEQUENTIAL WAS AT THE PAPAICH SITE & NOT AT ARNOLDS, & APPENDIX G PG 1 THRU 10 THE SAME FOR THE ENTIRE PH I PERIOD INVALIDATING THE ARNOLD & THE PAPAICH SEQUENTIAL RESULTS.

THE SECOND 'ERROR' IN TABLE 5 THAT THE ARNOLD TSP MONITOR WAS IN OPERATION FOR THE ENTIRE PH I PERIOD 12-18-1992 TO 2-14-93, THAT THE TSP'S WERE ON A 6 DAY ROTATION. THIS IS NOT TRUE, THAT TSP WAS AT ARNOLDS ONLY FROM 2-4-1993 TO 2-14-93 & OPERATED ON A EVERY OTHER DAY ROTATION. HOWEVER THE DATA SHEETS CORRECTLY SHOWED IT FOR 2 WEEKS & EVERY OTHER DAY I PERSONALLY CHANGED THE FILTERS ON THE ARNOLD SITE FOR THE 2 WEEK PERIOD & THE SEQUENTIAL ONCE.

HOW CAN THE PH I TESTING BE VALID WHEN ONE SITE TESTS FOR 2 MOS. ON A 6 DAY ROTATION & ANOTHER SITE TESTS FOR 2 WKS. ON A 2 DAY ROTATION, PLUS THE SITES BEING SWITCHED ON THE SFM-10.

g. THE ARNOLD VS JACKMAN SITE CONTRADICTION PH I AIR MONITORING.

ON 2-7-1993 BOTH THE JACKMAN SITE TSP MONITOR WHICH I CHANGED THE FILTER ON A 6 DAY ROTATION, & THE ARNOLD SITE TSP MONITOR ON A 2 DAY ROTATION COINCIDED & I CHANGED BOTH FILTERS THAT DAY. THE ARNOLD FILTER #177059 WAS MUCH DIRTIER THAN (b) JACKMAN FILTER #177055. BOTH MONITORED FUMIGANTS DURING THE SAME PERIOD. I THOUGHT IT SUCH A CONTRAST THAT I RECORDED IT IN MY DAY BOOK (ADEN# 12).

AFTER OSSIANDER FOUND ALTERATIONS IN THE ARNOLD PH I ANALYZED DATA, I CHECKED THE 2-7-1993 DATA RESULTS & FOUND THAT THE DIRTY ARNOLD FILTER ANALYZED LOWER .0937 AS. & 1.0208 PB THAN CLEANER JACKMAN FILTER AT .1186 AS. & 1.5667 PB. SEE PG 9 APPENDIX G ABOVE STUDY (ADEN# 10).

h. ARNOLD SITE PH I AIR MONITORING VS EBERLY ORGANIC GARDEN DOH SOIL SAMPLING CONTRADICTION.

TABLE 5 PG 24 OF THE PH I DOE AIR MONITORING STUDY SHOWS THE ARNOLD SITE HAD LOWER READINGS THAN ANY OF THE OTHER NORTHPORT MONITORS: LOWEST MAX AS. AT .09; LOWEST MAX PB. AT 1.02; 2ND LOWEST AVG. PB. AT .31; & 2ND LOWEST MAX PARTICULATES AT 36. (ADEN# 10)

YET THE EBERLY ORGANIC GARDEN, A NEARBY NEIGHBOR OF THE ARNOLDS, HAD THE HIGHEST HEAVY METAL POLLUTION RECORDED IN THE NORTHPORT SOIL STUDY BY DOH. HIGHEST IN AS. AT 110 PPM; HIGHEST IN MN. AT 956; 2ND HIGHEST IN CD. AT 2.16; & 2ND HIGHEST PB. AT 79.7. (ADEN# 13).

QUITE A PARADOX, THE LOWEST READINGS AT A HIGHLY SUSPECT PH I AIR MONITORING SITE, & THE HIGHEST READINGS OF AN INADEQUATE SOIL STUDY THAT WAS DESIGNED BY DOH MANAGEMENT NOT TO SAMPLE IN THE HIGH FALLOFF AREA. THE EBERLY GARDEN IS ADJACENT TO THE BORDER, BUT OUTSIDE THE COLUMBIA RV VY HEAVY FUME PATHWAY.

5. PROBLEM WITH DATA ANALYSIS

FRANK OSSIANDER, A RETIRED FEDERAL STATISTICIAN, FOUND DATA ALTERATION OF THE LABORATORY RESULTS OF PH I AIR MONITORING FROM THE ARNOLD SITE. ENOUGH EVIDENCE WAS PRODUCED TO INITIATE A CRIMINAL INVESTIGATION FOR FRAUD. DOE MANAGEMENT REQUESTED THAT REGION 10 EPA INSPECTOR GENERALS OFFICE INVESTIGATE. THIS IS CONTRARY TO WASH. CODE 42.40.040 WHICH STATES THE STATE AUDITOR SHALL INVESTIGATE. THE I.G. NARROWED THE INVESTIGATION JUST TO THE DATA ALTERATION & USED QUESTIONABLE INVESTIGATIVE TECHNIQUES. BECAUSE THIS & WITHHOLDING OF ADDITIONAL DATA REPORTS THE CHARGES WERE NOT SUSTAINED. DOE CLAIMED 'ERROR', AS A RETIRED INVESTIGATOR I FEEL THAT IF THE ADDITIONAL ARNOLD IRREGULARITIES HAD BEEN INVESTIGATED INTENT COULD HAVE BEEN ESTABLISHED BY SHOWING TREND & DESIGN, THUS NULLIFYING 'ERRORS'. SEE (ADEN# 9) & COMMENTS ON THE ATSDR ASSESSMENT SUBMITTED BY OSSIANDER.

SPECIFIC COMMENTS ON THE ATSDR ASSESSMENT:

6. ON THE 'FORWARD PAGE' OF THE ATSDR HEALTH ASSESSMENT, 'EXPOSURE' PARAGRAPH-

"GENERALLY ATSDR DOES NOT COLLECT ITS OWN ENVIRONMENTAL SAMPLING DATA, BUT REVIEWS INFORMATION SUPPLIED BY EPA, OTHER GOVERNMENT AGENCIES, BUSINESS, & THE PUBLIC. WHEN THERE IS NOT ENOUGH ENVIRONMENTAL INFORMATION AVAILABLE, THE REPORT WILL INDICATE FURTHER SAMPLING DATA IS NEEDED."

a. THERE IS NOT ENOUGH VALID ENVIRONMENTAL INFORMATION DUE TO WA. DOE & DOH SUBJECTIVE STUDIES.

b. THE DOH NORTHPORT SOIL SAMPLING WAS DESIGNED TO UNDERMEASURE THE COLUMBIA RV VY SOIL POLLUTION:

DAVID NASH WAS ALLOWED TO SAMPLE ONLY 3 SITES BY HIS SUPERIORS. THEY PRESELECTED THE SITES PRIOR TO NASH'S ARRIVAL & WITHOUT CONSULTATION WITH WE IMPACTED RESIDENTS. ONE OF THE 3 SITES WAS MILES OUTSIDE THE HEAVY FALLOFF AREA & THE PARTY HAD NO DIAGNOSED DISEASE. WHEN I FOUND OUT THE LIMITED & SUBJECTIVE SCOPE OF THE SAMPLING I REFUSED TO PARTICIPATE. NASH COMPROMISED BY OFFERING TO TAKE A SPLIT SAMPLE FROM MY GARDEN & ONE OTHER. ON SUCH SHORT NOTICE I WAS UNABLE TO CONTACT WORTHEN SO THE EBERLY ORGANIC GARDEN WAS SAMPLED. THIS SITE IS ADJACENT TO THE CANADIAN BORDER, BUT SOME DISTANCE EAST OF THE MAIN FLOW OF POLLUTION WHICH IS ON THE WEST SIDE OF THE RIVER, BUT INSIDE THE HEAVY FALLOFF AREA. IT IS ADJACENT TO THE ARNOLD PH I AIR MONITOR SITE.

THE UNSCHEDULED EBERLY GARDEN SOIL SAMPLES PROVED TO BE THE HIGHEST OF THE STUDY (ADEN# 13). WE FEEL THAT SOIL SAMPLES FROM THE WORTHEN GARDEN WOULD HAVE BEEN HIGHER.

ONLY 4 METALS WERE ANALYZED, SMALL VS. TACOMA & CITY OF TRAIL (ADEN# 6).

THE SELECTION OF THE MORRISY 'CONTROL' GARDEN IS HIGHLY SUSPECT WITH 70 PPM AS. WHEN THE STATE AVERAGE BACKGROUND LEVEL IS 2.95 PPM. OR 23.9 TIMES LESS (ADEN# 15).

AFTER 20 YEARS OF EPIDEMIOLOGICAL STUDIES NO DISCERNABLE PATTERN OF NON OCCUPATIONAL DISEASE WAS FOUND (ADEN# 7).

THE NORTHPORT STUDY OF 3 SUBJECTIVELY SELECTED GARDENS IS LACKING A BROAD ENOUGH BASE TO BE STATISTICALLY ADEQUATE. ADDITIONAL SOIL SAMPLING IS REQUIRED & ATSDR'S ASSESSMENT FAIL TO ASK FOR IT. WE ARE NOW ASKING FOR IT, BY A DISINTERESTED PARTY & TO BE ANALYZED BY A DISINTERESTED LABORATORY.

SPECIFIC COMMENTS ON THE ATSDR NORTHPORT PUBLIC HEALTH ASSESSMENT

FG# 1 'SUMMARY' BOTTOM PARA.

1. THE RATE OF IBD DOES NOT 'APPEAR' TO BE ELEVATED. THIS IS INCORRECT, WHEREAS IT DOES NOT APPEAR TO BE ELEVATED IN THE TOWN OF NORTHPORT IT IS ELEVATED A FEW MILES NORTH OF NORTHPORT IN A SPARSELY POPULATED RURAL AREA OF THE COLUMBIA WHERE WITHIN A APPROX. 1½ MI. RADIUS WE HAVE APPROX. ONE DOZEN IBD. CASES ON BOTH SIDES OF THE RIVER. (ADEN# 8)

2. "DISEASE INCIDENCE DOES NOT APPEAR TO BE ASSOCIATED WITH EITHER COMINCO OR WITH SPECIFIC CONTAMINANTS PRESENT IN COMINCO EMISSIONS".

a. SINCE THE CAUSE OF COLITIS IS UNKNOWN, & THE EMISSIONS TESTED WERE VERY LIMITED THE ABOVE QUOTE IS SUBJECTIVE, & OVERLY PROTECTIVE OF COMINCO.

b. ATSDR HAS MISREAD THE INTENT OF WE IMPACTED RESIDENTS. WE DID NOT ASK FOR OR WANT YOUR EFFORTS TO BE SOLELY LIMITED TO FIXING BLAME ON COMINCO. WHAT WE WANT IS A THOROUGH & OBJECTIVE INVESTIGATION & STUDY TO FIND THE CAUSE OF OUR DISEASES. SINCE THE CAUSE OF COLITIS IS UNKNOWN TO MEDICAL SCIENCE IT APPEARS THAT OUR HIGH IBD RATE IN SUCH A SMALL AREA WOULD BE AN OPPORTUNITY TO FIND ITS CAUSE & FURTHER MEDICAL SCIENCE. ATSDR'S ASSESSMENT STATES THERE ARE NO SOIL STUDIES RE-ARSENIC & HUMAN HEALTH ANOTHER OPPORTUNITY TO FURTHER MEDICAL SCIENCE.

FG#2 'BACKGROUND'

1. ATSDR "SPECIFICALLY ADDRESSES PUBLIC HEALTH CONCERNS REGARDING POTENTIAL EXPOSURE OF CONTAMINANTS IN AIR EMISSIONS & FUMED SLAG" FROM COMINCO. WE FEEL THAT ATSDR SHOULD HAVE SPECIFICALLY ADDRESSED OUR SOIL CONTAMINANTS, SWIMING HOLE SEDIMENT CORE SAMPLES CONTAMINANTS, & PRIVATE DRINKING WATER SYSTEM CONTAMINANTS TOO. NOT IN THE LIMITED SPECTRUM OF 7 METALS AIR STUDY, & 4 OF THE SAME METALS SOIL STUDY, BUT THE SAME 29 METALS THAT THE TRAIL STUDY TESTED COMINCO FOR (WHO SHOULD BETTER KNOW?) PLUS DIOXINS.

2. THE ABOVE STATEMENT NEGLECTS PAST & PRESENT AIR & WATER POLLUTION FROM THE CELGAR PULP MILL AT CASTLEGAR, B.O., & UPRIVER CANADIAN MUNICIPAL SEMI TREATED SEWER DISCHARGES INTO THE COLUMBIA.

FG#2 'SITE DESCRIPTION & HISTORY'

1. THE NORTHPORT SMELTER OPERATED A MAXIMUM OF 17 YRS. SOME OF WHICH WAS SPORADIC BECAUSE OF LABOR TROUBLES. THE EXTENT OF ITS OPERATION WAS SMALL WHEN COMPARED TO COMINCO DURING THE SAME PERIOD. THE PREVAILING WINDS ARE FROM THE NO. EAST TO THE SO. WEST, BLOWING ITS CONTAMINANTS AWAY FROM OUR HEALTH PROBLEM AREA. IN RECENT YEARS THERE HAS BEEN AN ATTEMPT TO BLAME OUR RECENT HEALTH PROBLEMS ON THE NORTHPORT SMELTER. AS A RESULT DOE INITIATED A SITE STUDY & APPOINTED AN EMPLOYEE OF A COMINCO SUBSIDIARY AS THE CITIZEN CONTACT, WHO LIVED MANY MILES AWAY IN AN ADJOINING COUNTY. ANOTHER EXAMPLE OF DOE COMPLICITY.

PG# 5 ENVIRONMENTAL CONTAMINATIONS- ON SITE- AIR

1. ATSDR STATES "NO AMBIANT AIR DATA EXISTS FOR NORTHPORT PRIOR TO 1992." THIS IS NOT TRUE.

a. IN THE TRAIL SMELTER CASE OVER 5,000 SO₂ AIR SAMPLES WERE TAKEN AROUND NORTHPORT & IN THE COLUMBIA RIVER BY DR. STEWART GRIFFIN, A CHEMIST FOR THE U.S. DEPT. OF AGRICULTURE. MY INFORMATION OBTAINED FROM THE BRIEF OF THE I.J.C. TRAIL SMELTER REFERENCE (ADEN# 14), COMPLETE MATERIAL SHOULD BE AVAILABLE THROUGH THE NATIONAL ARCHIVES AS FOUND BY OTHER RESEARCHERS OF THE TRAIL SMELTER CASE.

b. IN 1983/85 WA DOE CONDUCTED AIR MONITORING ON THE CARL THOMPSON FARM SITE JUST NO. OF NORTHPORT ON THE WEST SIDE OF THE COLUMBIA RIVER. I CHANGED THE FILTERS ON A 6 DAY ROTATION ON A TSP MONITOR FOR THE MAJOR PORTION OF THE STUDY. AFTER A FEW MONTHS INTO THE STUDY I ASKED THE DOE FIELD MAN, CARL CLUBB, HOW THE MARBLE FLATS MONITOR WAS DOING (2ND MONITOR SITE OF THE STUDY). CLUBB SAID IT HAD BEEN STOPPED. I ASKED HIM WHY, THEN BY WHOM. HE SAID HE HAD ONE YEAR TO GO BEFORE RETIREMENT & HE WAS SAYING NO MORE.

SHORTLY THEREAFTER I ASKED DOE FOR THE MONITORING RECORD FROM THE MARBLE SITE & THEY SAID THEY HAD NONE. THEY TOLD ME THE THOMPSON SITE READINGS DID NOT EXCEED LIMITS.

IN THE EARLY 1990'S A NEIGHBOR, BONNIE SZUCH, TRIED TO GET COPIES OF THE THOMPSON SITE RECORDINGS & DOE SAID THEY HAD NONE.

c. IN 1983 DOE CONTRACTED WITH A GONZAGA UNIV. PROF., NAME UNK., TO SHARE RESULTS OF A AIR STUDY ON MARBLE FLATS, (7 MI. SO. OF NORTHPORT) WITH A AUTOMATED RECORDER ON A CONTINUOUS BASIS FOR SITING PURPOSE FOR A KETTLE FALLS WWP POWER PLANT. DOE STOPPED THEIR MONITORING AFTER A SHORT PERIOD.

d. WHILE NOT SPECIFICALLY COVERING THE NORTHPORT AREA, B.C. ENVIRONMENT CONDUCTED STUDIES OF TRAIL AIR QUALITY (COMINGO EMISSIONS), & OF KOOTENAY AIR & WATER QUALITY DURING THE 1975/85 PERIOD. THESE STUDIES COVER COMINCO, CELGAR, MUNICIPALITIES & OTHERS WHOSE POLLUTANTS EFFECTED THE COLUMBIA RIVER & ITS VALLEY. COPIES ARE AVAILABLE.

SOIL PG#6

1. LAST SENTENCE. "THESE SOIL DATA ARE FROM A RELATIVELY SMALL NUMBER OF SAMPLING SITES, & MAY OR MAY NOT BE A GOOD INDICATION OF THE METAL LEVELS THROUGHOUT NORTHPORT". THIS IS A TACIT ADMISSION THAT MORE SAMPLING IS NEEDED.

2. PG#7 PARA.# 1 "ALL METALS SLIGHTLY EXCEEDED ATSDR COMPARISON VALUES, BUT LEVELS OF ARSENIC & MANGANESE WERE COMPARABLE WITH 'BACKGROUND' CONCENTRATIONS MEASURED IN AREAS NOT AFFECTED BY SMELTER OPERATIONS (TABLES E-3 & E-4 APPENDIX E). CONCENTRATIONS OF CADMIUM & LEAD WERE SLIGHTLY HIGHER IN NORTHPORT SOILS THAN IN BACKGROUND SOIL SAMPLES (TABLES E-3, E-4, & E-5 APPENDIX E).

a. ARSENIC- THE MORRISSEY GARDENS AS. READING OF 71.4 PPM. IS AN ANOMALY AS A BACKGROUND CHECK. THE AVERAGE WASH. ST. BACKGROUND LEVEL FOR AS. IS 2.92; FOR EASTERN WA. IT IS 2.95; & FOR THE SPOKANE BASIN 4.99. THE MORRISSEY CONTROL IS 24.4 TIMES THE STATE AVG.; 24.2 TIMES THE E. STATE AVG.; & 14.3 TIMES THE SPOKANE BASIN AVG.

FIRST THE ABOVE ATSDR STATEMENT SAYS "AREAS", PLURAL. THE MORRISSEY GARDEN IS ONE SINGLE PLACE I AM SURE IF SEVERAL GARDEN SITES IN DIFFERENT AREAS WERE CHOSEN AT RANDOM THE CONTROL WOULD MORE ACCURATELY REFLECT THE STATE AVERAGE. THEY CHOSE BUT ONE SITE WHICH MAY NOT HAVE BEEN A SMELTER SITE, BUT IT IS AN ABNORMALITY. COULD IT HAVE BEEN A CHEMICALLY IMPACTED SITE LIKE 'LOVE CANAL'? ETC. ETC. WHATEVER, IT DISTORTS THE STUDY & SHOULD NOT HAVE BEEN USED. AN INVESTIGATION SHOULD BE CONDUCTED ON HOW THIS SITE WAS CHOSEN, & A STUDY AS TO WHY IT READS 71.4 AS.

ATSDR SHOULD WITHDRAW ITS CONCLUSION THAT NORTHPORT ARSENIC IS COMPARABLE WITH BACKGROUND LEVELS. IT IS VERY UNPROFESSIONAL FOR ATSDR TO USE THE MORRISSEY SITE.

IT IS MY CONCLUSION THAT WA. DOH DESIGNED THE SOIL STUDY TO FAIL BY ATTEMPTING TO SELECT WHAT THEY THOUGHT WOULD BE THE LOWEST RECORDING NORTHPORT GARDEN SITES & THE HIGHEST RECORDING CONTROL SITE.

GROUND WATER

1. PG# 7 WHEREAS THE REFERENCE SECTION CITES ARSENIC VS. DRINKING WATER STUDIES AS FAR AWAY AS BENGAL, & THE NARATIVE ON PG# 7 STATES 2 DOMESTIC WELLS NO. OF NORTHPORT WERE TESTED IN 1989 PLUS WA DOH ROUTINELY TESTS NEW WELLS NO REPORTS OR DATA ARE SUPPLIED TO VERIFY.

a. WHOSE WELLS WERE TESTED IN 1989? WHAT WERE THEY TESTED FOR & SPECIFICALLY WHAT WERE THE LEVELS OF POLLUTION FOUND? WERE THESE WELLS THE WELLS OF DISEASE IMPACTED FAMILIES?

b. ARE THE ROUTINE TESTS OF NEW WELLS BY DOH ADEQUATE FOR THE PURPOSE OF A HEALTH STUDY & ATSDR ASSESSMENT. I THINK NOT UNLESS IT CAN BE SHOWN THAT THESE TESTS WERE FROM THE WELLS OF HEALTH IMPACTED FAMILIES, ESPECIALLY THOSE WITH I.B.D., & THEY HAD USED THE NEW WELLS FOR A REASONABLE PERIOD PRIOR TO THE ILLNESS. ALSO I WOULD SAY FROM MY PERSONAL KNOWLEDGE THAT MOST OF OUR HEALTH IMPACTED FAMILIES LIVE ON OLDER FARMS & ARE PROBABLY USING OLDER WELLS. THE HIGH LEVEL OF AS. IN OUR SOILS MUST EFFECT THE GROUND WATER & WELLS.

THE WELLS OF IMPACTED FAMILIES WHO HAVE NOT BEEN TESTED NEED TESTING AS A PART OF THE DOH HEALTH STUDY & ATSDR ASSESSMENT.

OFF SITE CONTAMINATION- SEDIMENT PG# 8 & SURFACE WATER PG# 10

1. NO CORE SAMPLES TAKEN FOR HEAVY METALS, DIOXINS, OR ORGANIC MATTER FROM THE 'SWIMMING HOLE' ADJACENT TO THE COLUMBIA. MANY OF THE YOUTH NOW IBD IMPACTED ADULTS SWAM HERE. THEY ALSO SWAM IN THE COLUMBIA RV. DURING THIS PERIOD CELGAR PULP MILL WAS KNOWN AS ONE OF THE 'DIRTIEST' MILLS IN B.C. THE MILL HAD MODERNIZED & 'CLEANED UP' BY THE TIME OF THE USGS COLUMBIA RIVER STUDY.

2. PG 11 PARA I "A NEW SMELTER WAS BUILT IN THE LATE 1980S. THIS NEW SMELTER HAS REDUCED ALL METAL CONCENTRATES IN THE EFFLUENT."

THE ABOVE IS NOT CORRECT, ALTHOUGH A NEW GERMAN SMELTER WAS STARTED IN THE LATE '80 S, IT DID NOT WORK (COMINCO DID NOT DO ADEQUATE PRE TESTING). THEREFORE THE OLD TURN OF THE CENTURY LEAD SMELTER CONTINUED TO OPERATE & POLLUTE US INTO 1997 UNTIL THE 2ND NEW KIVOET SMELTER TOOK OVER.

BIOTA- FISH PG 11

ENCLOSED IS A NEWSPAPER ARTICLE PUBLISHED IN THE STATESMAN EXAMINER, 220 S. MAIN ST. COLVILLE WA. 99114 509-684 4567, IN THE EARLY '90 S.

FISH WARNING SIGNS HAD BEEN POSTED ALONG LAKE ROOSEVELT. DOH & COUNTY HEALTH STATED IT WAS SAFE TO EAT THE FISH BASED IN LARGE PART ON A DOH DIOXIN REPORT. LOCAL REPORTER LORAIN MARIE INTERVIEWED NATIONALLY RECOGNIZED DIOXIN AUTHORITIES WHO STATED THE REPORT WAS FAULTY. (ADEN# 3) HOW CREDIBLE ARE DOH STUDYS?

IN A LATER DIOXIN FISH STUDY THE EPA CONTRACTOR IMPROPERLY HOMOGENIZED THE SAMPLES DESTROYING THEIR VALIDITY. DIFFERENT SAMPLES WERE THEN USED. ATSDR SHOULD DOUBLE CHECK THE LABORATORY PROCEDURES & DATA ANALYSIS OF LAKE ROOSEVELT FISH-DIOXIN STUDIES BEFORE ACCEPTING THEM AT FACE VALUE.

BIOTA- GARDEN PRODUCE PG 13

1. "BASED ON AVAILABLE DATA & LIMITED SAMPLING OF THREE GARDEN PLOTS, ATSDR CONSIDERS THE INGESTION OF NORTHPORT CROPS AS A PAST, CURRENT, & POTENTIAL COMPLETED EXPOSURE FOR CADMIUM & LEAD."

a. THE KEY HERE IS 'LIMITED SAMPLING'- ONLY ^{Sites 65} 3 ~~2~~ SAMPLES TAKEN. NOT ENOUGH FOR A STATISTICALLY ADEQUATE CONCLUSION.

b. THE HEAVY FALLOFF AREA OF THE COLUMBIA RIVER VALLEY WITH ITS HEAVY FUME PATHWAY WAS NOT SAMPLED. THIS AREA HAD THE HIGHEST SO2 RECORDING, 1.6, IN THE TRAIL SMELTER CASE (ADEN# 14), & TO THIS DAY IT CAN BE SEEN THAT THE REGROWTH IS STUNTED. THE NORTHPORT SOIL STUDY WAS DESIGNED TO AVOID THIS HEAVY FALLOFF AREA.

c. WHEREAS THE TRAIL SMELTER STUDY DID NOT TEST FOR ARSENIC THE POTENTIAL FOR EXCEEDING THE 200 PPM IN THIS AREA IS A REASONABLE HYPOTHESIS. THIS COULD APPLY TO CADMIUM, LEAD, & MANGANESE.

ARSENIC PG# 17 "ARSENIC WAS DETECTED IN NORTHPORT AIR & GARDEN SOILS AT LEVELS THAT EXCEEDED ATSDR COMPARISON VALUES. RESIDENTS, THEREFORE, COULD BE EXPOSED TO LOW LEVELS OF ARSENIC VIA INCIDENTAL INGESTION OF & DERMAL CONTACT WITH ARSENIC IN THE SOIL, & INHALATION OF AIRBORNE DUST."

"MOST AVAILABLE INFORMATION ON ARSENIC COMES FROM LABORATORY ANIMAL STUDIES & EPIDEMIOLOGIC STUDIES IN HUMANS DRINKING CONTAMINATED WATER, WHICH LIMITS THE STUDIES' USEFULNESS IN ASSESSING HEALTH EFFECTS FOR NORTHPORT RESIDENTS EXPOSED TO CONTAMINATED SOIL OR DUST."

ARSENIC PG# 19 "THE MAXIMUM AMBIENT ARSENIC LEVEL DETECTED IN NORTHPORT AIR-" & PG 20 "ATSDR CONCLUDES THAT BREATHING AMBIENT AIR IN NORTHPORT IS NOT LIKELY TO RESULT IN ARSENIC-RELATED NONCANCER HEALTH EFFECTS."

1. ATSDR COMPARISON VALUES WOULD HAVE BEEN EXCEEDED TO A GREATER EXTENT HAD THE BOGUS MORRISY CONTROL NOT BEEN USED.

2. THE LEVELS OF ARSENIC FROM SOILS TESTING WOULD HAVE BEEN HIGHER HAD THE DESIGN OF THE STUDY NOT EXCLUDED THE HEAVY FALLOFF AREA OF THE COLUMBIA RIVER.

THE CONCLUSIONS ARRIVED AT ARE BASED ON MEDIUMS UNRELATED TO SOILS, THE LIMITED SAMPLES STUDIED ARE STATISTICALLY INADEQUATE, & THE STUDY WAS DESIGNED TO AVOID THE HEAVY FALLOUT AREA. THE SOIL STUDY IS INVALID

3. ARSENIC IN AMBIENT AIR- THE CONCLUSION DRAWN THAT IT IS SAFE TO BREATHE THE AIR IN NORTHPORT IS OFF THE POINT.

a. THE AIR MONITORING PROCEDURES & DATA EVALUATION IN THE HEAVY FALLOFF AREA WERE EXCLUSIONARY, DECEPTIVE, & OF QUESTIONABLE AUTHENTICITY.

b. OUR MAJOR HEALTH PROBLEMS ARE NOT IN NORTHPORT, BUT NORTH OF NORTHPORT. TO LIMIT YOUR CONCLUSION TO IN NORTHPORT MIGHT BE TECHNICALLY CORRECT, BUT THIS IS NOT THE HEALTH & POLLUTION IMPACT AREA.

CADMIUM PG# 21 FACTOR IN THE QUESTIONABLE MONITORING & SAMPLING AS PREVIOUSLY STATED FOR REVISION.

SO2 PG# 23

THE NORTHPORT HIGH SCHOOL SO2 MONITOR IS CORRECTLY POSITIONED TO MEASURE THE SO2 FUMIGATION FOR THE STUDENTS & RESIDENTS OF THE TOWN OF NORTHPORT, BUT IT DUPLICATES COMINCO'S SO2 MONITOR JUST ACROSS THE RIVER FROM NORTHPORT. THE HIGH SCHOOL MONITOR IS MALPOSITIONED TO MEASURE THE SO2 FUMIGATION IN THE NORTHERN PORTION OF THE U.S. COLUMBIA RIVER & THE HEAVY FALLOFF AREA.

THE MAXIMUM SO2 READING DURING THE TRAIL SMELTER CASE STUDY WAS 1.6 PPM AT THE MORASKI FARM IN THE 1930'S. THIS EXCEEDS THE HIGHEST ONE HOUR AVERAGE READING OF .16 PPM BY 10 TIMES. (ADEN# 14) COMINCO HAS REDUCED ITS SO2 EMISSIONS SINCE THE 1930'S, BUT THE DOE PH II AIR STUDY FOR METALS ESTABLISHED A RATIO OF ROUGHLY 2 TO 1 WANETA (BORDER) TO PAPARICH'S MONITOR. IT WOULD BE SAFE TO SAY THAT THE SO2 FUMIGATIONS OF THE HEAVY FALLOFF AREA ARE TWICE THAT OF NORTHPORT. (ADEN# 10)

TRAIL SMELTER CASE

AS PART OF THE TRAIL SMELTER ARBITRAL TRIBUNAL DECISION OF 1941 A REGIME WAS ESTABLISHED TO CONTINUE IN PERPETUITY TO CONTROL TRANSBOUNDARY SO2 EMISSIONS FROM THE SMELTER. AS PART OF THE REGIME TWO SO2 CONTINUOUS RECORDERS WERE SITED TO RECORD & CONTROL THESE EMISSIONS.

1. AN AUTOMATED RECORDER WITH A DIRECT LINE TO THE SMELTER SMOKE CONTROL OFFICE WAS ESTABLISHED AT THE COLUMBIA GARDENS, B.C., CANADA 6 MILES SOUTH OF THE SMELTER & 4 MILES NORTH OF THE BORDER (WANETA) ON THE EAST SIDE OF THE COLUMBIA RIVER. (ADEN# 1)

2. A SIMILAR RECORDER WAS ESTABLISHED ~~WAS ESTABLISHED~~ ON THE WEST SIDE OF THE COLUMBIA RIVER OPPOSITE THE TOWN OF NORTHPORT. THIS RECORDER HAD NO CONTROL LINE TO THE SMELTER SMOKE CONTROL ROOM. (ADEN# 2)

ALTHOUGH THE TRAIL SMELTER CASE WAS A PRECEDENT SETTING INTERNATIONAL ENVIRONMENTAL CASE, NO PROCEDURE WAS ESTABLISHED BY THE REGIME FOR FOLLOWUP ONSITE INSPECTIONS BY A REGULATORY BODY. COMINCO OPERATED THE SITES. ALL THAT WAS REQUIRED OF COMINCO WAS THAT THEY SUBMIT MONTHLY REPORTS OF THE SO2 READINGS TO BOTH GOVERNMENTS. ON PAPER THIS LOOKS

GOOD, BUT IN PRACTICE IT RESULTED IN LACK OF TREE MAINTENANCE & OTHER OBSTRUCTIONS LEADING TO THE IMPEDANCE OF AIR FLOW TO THE RECORDER INTAKE PROBES. SINCE THE RECORDER CAN MEASURE ONLY THAT SO₂ WHICH REACHES INSIDE ITS MECHANISM IT WILL UNDER REPORT THE TRUE LEVEL OF THE SO₂ OUTSIDE. THE REGIME SET LIMITS FOR SO₂, .3 PPM DURING THE GROWING SEASON & .5 PPM DURING THE NONGROWING SEASON. IF IT IS .6 OUTSIDE THE RECORDER BUILDING BUT DUE TO AIRFLOW IMPEDANCE THE RECORDER IS ONLY READING & REPORTING .5 FOR THE OFFICIAL RECORDS COMINCO CAN SHOW THAT THEY ARE ABIDING BY THE REGIME WHILE ACTUALLY VIOLATING THE REGIME. COMINCO WILL MAKE MORE PROFIT, THE U.S. COLUMBIA RY VY WILL GET MORE SO₂ THAN WE SHOULD AS PER THE 1941 DECISION. (SEE ADEN# 1 & 2 FOR PHOTOS & DIAGRAMS OF TREES & OTHER OBSTRUCTIONS AT THESE SITES)

THE DIRECT LINE FROM THE COLUMBIA GARDENS RECORDER TO THE SMOKE CONTROL ROOM GIVES INSTANT SO₂ READINGS ALLOWING THE OPERATORS TO REDUCE OR CEASE SMELTER PRODUCTION IF THE SO₂ LEVELS BECOME TOO HIGH. CONVERSELY IT CAN ALLOW THEM TO REDUCE PRODUCTION ON THE 6 TH DAY IF A 6 DAY ROTATION MONITORING IS IN EFFECT, OR SMELT ORES OF HIGHER TOXICITY ON THE OTHER 5 DAYS. THIS IS WHY CONTINUOUS MONITORING IS ESSENTIAL NOT ONLY FOR SO₂, BUT FOR HEAVY METALS.

COMINCO COLUMBIA GARDENS RECORDER

DUE TO LACK OF MAINTENANCE & OVERSIGHT, TREES HAVE OVERGROWN THE COLUMBIA GARDENS MONITOR SITE & COVERED THE SO₂ INTAKE PROBE AT THE TIME OF THE 1996 INVESTIGATION. THE PROBE IS MALPOSITIONED ON THE EAST SIDE OF THE BUILDING WHERE AS IT SHOULD BE ON THE NORTH SIDE. THE PROBE IS AFFIXED NEAR THE ROOF EDGE WHERE IT IS SUBJECT TO IMPEDANCE FROM SNOW & ICE. EVIDENCE INDICATES THAT EITHER A 57 YEAR OLD TREE GREW UP NEXT TO THE BUILDING OR THE BUILDING WAS MOVED NEXT TO THE TREE. THESE & MORE ARE IN VIOLATION OF EPA REGULATIONS WHICH ARE NOT LAW IN CANADA, BUT THIS IS THE SITE THAT CONTROLS TRANSBOUNDARY SO₂ POLLUTION INTO THE U.S. & NO REGULATORY AGENCY ON EITHER SIDE OF THE BORDER HAS DEMONSTRATED RESPONSIBILITY FOR IT. MILLER OF WA DOE SAYS ITS OUTSIDE HIS JURISDICTION. (ADEN#1)

COMINCO NORTHPORT RECORDER

THE COMINCO NORTHPORT RECORDER DOES NOT CONFORM TO EPA OR WASH. ST. REGULATIONS. SEVERAL TREES ARE TOO CLOSE TO THE RECORDER. THE SO₂ INTAKE PROBE DOES NOT HAVE 180 DEGREE FREE FLOW OF AIR TO IT AS A POLE IS PLACED NEXT TO IT. THE POLE SERVES NO PURPOSE OTHER THAN TO CREATE AN OBSTRUCTION. MILLER OF WA DOE SAYS THIS SITE IS NOT HIS RESPONSIBILITY. (ADEN# 2 CONTAINS MAPS, DIAGRAMS, & PHOTOS OF THIS SITE)

WORTHEN MONITORING SITE

THIS IS THE SITE THAT THE MONITOR WAS MALPOSITIONED BY DOE THEN REMOVED BY DOE AFTER IT PROVED TO BE A VERY HIGH READING MONITOR AND ITS RESULTS EXCLUDED FROM PH II STUDY. PHOTOS & DIAGRAM SHOW TREE WHERE MONITOR IMPROPERLY SITED & ADJACENT GARDEN WHERE MONITOR COULD HAVE BEEN PROPERLY SITED. (ADEN#2 CONTAINS DIAGRAM & PHOTOS OF SITE).

BENNETT MONITOR SITE

THIS IS THE SITE OF THE PRESENT PH IV MONITORING. SITE IS CLEAR OF OBSTRUCTIONS WITH EXCEPTION THAT THE MONITORS ARE UNNECESSARILY CLOSE TO EACH OTHER ON THE PLATFORM. STARTUP OF SITE DELAYED UNTIL OLD SMELTER SHUT DOWN. (ADEN# 2)

HEALTH OUTCOME DATA

PG 30 "INVESTIGATORS NOTED THAT IF THE CAUSE IS ENVIRONMENTAL, THE MOST LIKELY EXPOSURE MAY BE TO THE METALS FOUND IN THE AREA (WADOH, 1995a, VANEENWYK, 1994)."

I DON'T KNOW HOW TO INTERPRET THIS STATEMENT. DOES IT MEAN METALS WHICH ARE NATIVE OR NATURALLY OCCURRING IN OUR SOIL OR THAT WHICH ARE TRANSPORTED IN? IF THE FORMER, THEN WHY DO WE HAVE SUCH A CLUSTER OF IBD IN A 1½ MI. RADIUS ENCOMPASSING THE RIVER & THE EDGE OF THE HEAVY FALLOFF ZONE? WHY WERE SO MANY OF THE IBD VICTIMS THE SAME THAT SWAM IN THE RIVER? IS THIS A SCIENTIFIC CONCLUSION OR A SUPPOSITION?

HEALTH OUTCOME DATA CONT'D

(b) (6) HAS HAD COLITIS FOR APPROX. 15 YEARS. WHEN (b) (6) FIRST CAME DOWN WITH IT WE WENT TO THE WILLIAMS CLINIC IN TRAIL. THEY DIAGNOSED (b) (6) AS HAVING THE FLU (IS THIS HOW THE IBD RATE IS KEPT LOW IN A COMPANY TOWN?). SINCE THE 'FLU' PERSISTED WE BYPASSED BOTH TRAIL & COLVILLE (AS MANY STEVENS CO. RESIDENTS DO) & WENT TO SPOKANE. DR STAGG, AN INTERNIST, DIAGNOSED (b) (6) AS HAVING COLITIS. THE ONE TIME IN 15 YRS. (b) (6) WAS HOSPITALIZED FOR THIS CONDITION WE WENT DIRECTLY TO THE DEACONESS HOSPITAL IN SPOKANE (AGAIN AS MANY STEVENS CO. RESIDENTS DO). I QUESTION THE COLVILLE HOSPITAL RATES AS BEING A GOOD INDICATOR OF THE IBD RATE.

CAUSE OF IBD PG 32

"PROBABLY CAUSED BY MULTIPLE INTERACTING FACTORS". I CAN ONLY SPEAK FOR (b) (6). NEITHER MINE OR (b) (6) HISTORY OF IBD. (b) (6) HAS NEVER (b) (6).

CONCLUSION PG#38

REGARDING NORTHFORT IBD- "DISEASE INCIDENCE IS NOT ASSOCIATED WITH EITHER PROXIMITY TO COMINCO OR WITH SPECIFIC CONTAMINANTS PRESENT IN COMINCO EMISSIONS".

I THINK THAT THIS IS A BOLD STATEMENT FOR ATSDR TO MAKE:

1. THE CAUSE OF COLITIS IS UNKNOWN TO MEDICAL SCIENCE.
2. INADEQUATE & SUBJECTIVE SOIL 'STUDY'
 - a. NOT ALL THE CONTAMINANTS PRESENT IN COMINCO EMISSIONS TESTED FOR
 - b. STATISTICALLY INADEQUATE NUMBER OF SITES
 - c. BOGUS CONTROL
 - d. AVOIDED HEAVY FALLOFF AREA
3. HIGHLY QUESTIONABLE AIR 'STUDY'
 - a. PH I ARNOLD SITE CONTRADICTIONS & ALTERATIONS
 - b. AVOIDED HEAVY FALLOFF AREA
 - PH II WORTHEN NEGATION
 - PH IV BENNETCH DELAY
4. COMINCO PROXIMATEY CONCLUSION HIGHLY QUESTIONABLE
 - a. ASSESSMENT HAS NOT SHOWN THAT OTHER HI INCIDENCE AREAS HAVE AS CONCENTRATED IBD CLUSTER AS THE COLUMBIA RV VY.
 - b. HI CLUSTER IS DIRECTLY IN COMINCOS FUME PATHWAY

I AM NOT SAYING THAT COMINCO IS RESPONSIBLE FOR OUR HEALTH PROBLEMS, I WILL LEAVE THAT TO THE PROFESSIONALS WHEN I FIND THEM. WHAT I AM SAYING IS THAT ATSDRS' CONCLUSION EXONERATING COMINCO IS IRRESPONSIBLE IN VIEW OF THE FACTS.

RECOMMENDATIONS

1. CONTINUOUS BROAD SPECTRUM PH IV AIR MONITORING FOR HEAVY METALS & DIOXINS WITH EFFICIENT AIR MONITOR BY DISINTERESTED PROFESSIONALS
2. COMPREHENSIVE SOIL STUDY SUCH AS TRAIL & TACOMA, BROAD SPECTRUM INCLUDING DIOXINS.
3. SEDIMENT CORE SAMPLES, BROAD SPECTRUM INCLUDING DIOXINS.
4. BROAD SPECTRUM TESTING OF PRIVATE WELLS OF IMPACTED FAMILIES. (b) (6)

(b) (6) (b) (6)

BOX (b) (6)

NORTHFORT, WA. 99157

(b) (6)

DISTRIBUTION:

- 1 COPY TO ATSDR
- 1 COPY TO THE OFFICE OF THE INSPECTOR GENERAL

TO: AGENCY FOR TOXIC SUBSTANCES & DISEASE REGISTRY
DIVISION OF HEALTH ASSESSMENT & CONSULTATION

ATTENTION CHIEF, PROGRAM EVALUATION, RECORDS, & INFORMATION SERVICES BRANCH, E-56
1600 CLIFTON ROAD, N.E., ATLANTA, GEORGIA 30333

THIS IS THE BACKUP INFORMATION FOR MY CRITIQUE OF THE ATSDR PUBLIC HEALTH ASSESSMENT OF THE NORTHPORT, WASHINGTON AREA. THE CRITIQUE WILL BE SENT BY 'E' MAIL OR THE U.S. POSTAL SERVICE.

THE ADDENDUM ARE AS FOLLOWS:

- #1. DIAGRAM, PHOTOS, & INFORMATION ON THE COMINCO COLUMBIA GARDENS SO2 MONITORING SITE.
- #2. DIAGRAM, PHOTOS, & INFORMATION ON THE COMINCO NORTHPORT SO2 MONITORING SITE.
- #3. COPY OF STATESMAN EXAMINER ARTICLE "HEALTH DEPT. SITTING ON FAULTY FISH STUDY?"
- #4. EXCERPTS OF DEAN & SWAIN METEOROLOGICAL INVESTIGATIONS OF THE COLUMBIA RIVER VALLEY 1944.
- #5. EXCERPTS FROM THE TRAIL, B.C. SOILS ANALYSIS
- #6. EXCERPTS FROM THE TACOMA, WA. (ASARCO) SOILS ANALYSIS.
- #7. EXCERPTS FROM THE TACOMA, WA. (ASARCO) RISK ASSESSMENT.
- #8. COLUMBIA VALLEY CITIZENS HEALTH SURVEY.
- #9. COPY OF PRESENTATION FOR WASHINGTON STATE SENATE ENVIRONMENTAL COMMITTEE.
- #10. EXCERPTS FROM WA-DOH 1994 NORTHPORT AIR MONITORING & HEALTH STUDY.
- #11. EXCERPTS FROM THE 1941 TRAIL SMELTER ARBITRAL TRIBUNAL DECISION.
- #12. DAYBOOK ENTRY RE- NORTHPORT PH I JACKMAN & ARNOLD AIR MONITORING.
- #13. WA-DOH SOILS ANALYSIS REPORT ON NORTHPORT AREA GARDENS.
- #14. EXCERPTS FROM BRIEF OF I.J.C. TRAIL SMELTER REFERENCE.
- #15. CRITIQUE OF WA-DOH SOIL STUDY DRAFT.
- #16. EXCERPTS FROM DINWOODIE INTERNATIONAL JOURNAL ARTICLE RE- TRAIL SMELTER CASE.

FROM:

(b) (6)

BOX (b) (6)

NORTHPORT, WA. 99157

(b) (6)